

6. Based upon the foregoing, the parties jointly move to dismiss this matter, subject to a motion to vacate within 90 days hereof ;

WHEREFORE, Plaintiff, MIDWEST GAS TRANSMISSION COMPANY and Defendant, EXXONMOBIL OIL CORPORATION, requests that this Honorable Court enter the attached ORDER OF DISMISSAL, and conditions, and for any and all such other relief this Court finds to be just, necessary, or proper.

**MIDWEST GAS TRANSMISSION
COMPANY**

By: /s/ Jennifer A. Kenedy

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EXXONMOBIL OIL CORPORATION

By: /s/ Frank P. Andreano

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EXHIBIT A

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October 28, 2014

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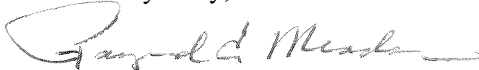
Re: **IDOT v. Exxon Mobil; North and South Parcels**
Route: FAI Route 55 at Arsenal Road
County: Will
Job No.: R-91-014-02
Parcel: 1GQ0001 & TE-A & 1GQ0003-A&B, TE-A, B & C
MGT vs. Exxon Mobil Case 13-CV-2165

Dear Mr. Andreano:

While negotiations between the Illinois Department of Transportation and Exxon have been complex, IDOT and Exxon have reached a "global settlement" of the two pending IDOT cases and the Exxon/MTG Pipeline case in Federal Court for which IDOT ultimately is responsible to MTG for reimbursement. These were inter-related because of valuation methodology utilized and consolidation issues proposed by Exxon. As a result, IDOT needs to procure additional updated appraisal reports which reflect the final valuations and the allocation of the overall settlement. Although the total amount is determined, IDOT must inform me how to allocate the funds between the cases. I have engaged an appraiser to prepare additional written valuation information necessary for IDOT and the Attorney General to issue the final written authorization. IDOT will also need some further updated valuation information from Exxon on its updated draft appraisal on the Interchange Parcel. IDOT was only given an unsigned "draft appraisal" which was being updated with new valuation information during our negotiations. The appraisal needs to be finalized and signed. The IDOT appraiser I retained has indicated that it will take about 90-120 days to complete the full appraisal process because of the magnitude and complexity of the properties involved. I expect about another 45 to 60 days for final written approval. This process takes time because of the required protocol of IDOT and the Attorney General on all settlements involving Federal funds. IDOT and Exxon are in Court on February 19, 2015 for status on the settlement approval. I should have all the documentation by that time.

Once approved in writing by IDOT and the Attorney General, the agreed final judgment orders can be entered which I anticipate will be in Spring of 2015 along with the dismissal of the Federal case. I am confident that this global settlement will receive final approval but unfortunately the process takes a significant amount of time to effectuate.

Yours very truly,



Raymond E. Meader
Special Assistant Attorney General

REM:cdp